

**MEMO ENDORSED**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,

Plaintiff,

v.

STEVEN DONZIGER, THE LAW OFFICES  
OF STEVEN R. DONZIGER; et al.,

Defendants.

Case No. 11-CV-0691 (LAK)

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**STEVEN DONZIGER, THE LAW OFFICES OF STEVEN R.  
DONZIGER, AND DONZIGER & ASSOCIATES PLLC'S  
MOTION FOR PROTECTIVE ORDER**

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The fact that Donziger was deposed extensively in the Section 1782 proceeding does not warrant restricting his deposition in this case to one as opposed to three days. Donziger is a central and perhaps the central figure in this dispute. The 1782 deposition was taken beginning in late 2010 and concluding in or about late January 2011. Since that time, there have been many highly pertinent events, including among other things the rendition of the judgment in Ecuador. In addition, a great deal of evidence – including evidence relating directly to Donziger – has come to light only recently including, but not limited to, the recently filed declarations of former judge Guerra, Messrs. Reyes, Beltman and Bogart, and Ms. Maest. This is a basis for denying this motion that is entirely independent of the Court's April 8 order.

The motion [DI 1035] is denied.

SO ORDERED.

Dated: April 23, 2013

A handwritten signature in black ink, appearing to read 'L. Kaplan', is written over a horizontal line.

Lewis A. Kaplan  
United States District Judge